

EXHIBIT D

1 WILLIAM SINGHOSE, Ph.D - [REDACTED]

2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF VIRGINIA
4 NORFOLK DIVISION

5 -----X
6 THE COLEMAN COMPANY, INC.,

7 Plaintiff/Counter-claim Defendant,

8 vs.

9 TEAM WORLDWIDE CORPORATION,

10 Defendant/Counter-claim Plaintiff.
11 -----X

12 ATTORNEYS' EYES ONLY

13 VIDEOTAPED DEPOSITION OF WILLIAM SINGHOSE, Ph.D

14 taken remotely via ZOOM

15 Atlanta, Georgia

16 Wednesday, August 18, 2021

17
18 REPORTED BY:

19 BOBBIE ZELTMAN
20 Professional Realtime Court Reporter
and Notary for New York and Florida
21 Located in Fort Lauderdale, Florida

22 Job Number 198481
23
24
25

1 WILLIAM SINGHOSE, Ph.D - [REDACTED]

2 law firm in Washington, D.C.

3 THE VIDEOGRAPHER: Will the
4 court reporter please swear in the
5 witness.

6 THE REPORTER: Raise your right
7 hand, please, sir.

8 Do you solemnly swear that the
9 testimony you're about to give will be
10 the truth, the whole truth and nothing
11 but the truth, so help you God?

12 THE WITNESS: Yes.

13 THE REPORTER: Thank you. Hold on.
14 You may proceed.

15 WILLIAM SINGHOSE, Ph.D,
16 having been first duly sworn by
17 Barbara R. Zeltman, Notary Public, was
18 examined and testified as follows:

19 EXAMINATION

20 BY MR. WOODS:

21 Q Good morning, Dr. Singhose.

22 A Good morning.

23 Q My name is Michael Woods and I
24 represent the defendant in this litigation,
25 Team Worldwide Corporation, in a lawsuit by

1 WILLIAM SINGHOSE, Ph.D - [REDACTED]

2 BY MR. WOODS:

3 Q Looking at the top of Page 28, you
4 have an image of a cross-section of an
5 accused TWW product.

6 Is it your opinion that what's
7 shown there meets this claim element
8 involving mattress coils?

9 A Yes.

10 Q And what is your understanding of
11 what is required for something to be a
12 mattress coil in the context of the
13 '618 patent?

14 A I think the '618 patent mattress
15 coil indicates some physical structure that
16 extends, as it says in the limitation,
17 continuously from the first panel, the top
18 panel to the bottom panel. So the
19 structures that extend between those two
20 would tend to hold those surfaces, those
21 panels together when it's inflated.

22 Q So then it's your opinion that
23 what's shown -- strike that.

24 Is it your opinion then that it
25 just needs to be something that holds those

1 WILLIAM SINGHOSE, Ph.D - A [REDACTED]

2 two that run continuously from the first
3 panel to the second panel?

4 MR. MORELAND: Object to scope.

5 Foundation.

6 Go ahead.

7 A Yes, the '618 doesn't clarify what
8 exactly these should look like in detail.
9 There's just some material that extends from
10 the top to the bottom and the obvious use of
11 those is that when you put air in here, it
12 stops the two surfaces from spreading too
13 far apart.

14 MR. WOODS: Bear with me just a
15 moment.

16 Dr. Singhose, I've uploaded to the
17 Chat feature what's been marked as
18 Exhibit 7.

19 Please let me know when you have
20 that downloaded and open, please.

21 THE WITNESS: Okay. I have
22 that downloaded and open.

23 (Singhose Exhibit 7, US Patent
24 No. 7,089,618 to Metzger,
25 COLEMAN_0000001 through

1 WILLIAM SINGHOSE, Ph.D - [REDACTED]

2 COLEMAN_0000009, was marked for
3 Identification.)

4 BY MR. WOODS:

5 Q You have in front of you what's
6 been marked as Singhose Exhibit 7.

7 It is US Patent Number 7,089,618.
8 It is a nine-page document with a beginning
9 Bates number in the lower right -- starting
10 in the lower right of the first page of
11 COLEMAN_0000001.

12 Are you familiar with this
13 document?

14 A Yes.

15 Q If you can go please to Column 5
16 and I'm looking at the paragraph that begins
17 about Line 11.

18 Let me know when you're there.

19 A Okay.

20 Q It says in this paragraph beyond
21 the second line, it says, "Each coil 18 has
22 a first elongated member 19 and a space
23 second elongate member 20 joined at one end
24 to a first plate 21 and at a space second
25 end to a second plate 23."

1 WILLIAM SINGHOSE, Ph.D - [REDACTED]

2 Is it your understanding that the
3 claim limitations which require mattress
4 coils in the '618 are limited to this
5 description in the specification about a
6 coil?

7 MR. MORELAND: Object to scope.

8 Go ahead.

9 A No, I do not think there's mention
10 of limited to the description of a coil that
11 is just in that one part of the patent
12 because the coils and their properties are
13 discussed in other parts of the patent as
14 well.

15 BY MR. WOODS:

16 Q I'm sorry. I was on mute again.
17 Thank you.

18 If you can go back please to
19 Exhibit 1 at the top of Page 28 again and
20 just let me know when you're there.

21 A Okay.

22 Q I'm sorry. Did you say you're
23 there?

24 A Yes, I'm there.

25 Q Oh, okay. Apologies. I didn't get

2 C E R T I F I C A T E

3 STATE OF FLORIDA)
 : ss.
4 COUNTY OF BROWARD)

I, BARBARA R. ZELTMAN, a Professional
Realtime Court Reporter and Notary Public,
within and for the State of Florida, do
hereby certify:

9 That WILLIAM SINGHOSE, Ph.D, the
0 witness whose deposition is hereinbefore
1 set forth, was duly sworn by me and that
2 such deposition is a true record of the
3 testimony given by the witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

9 IN WITNESS WHEREOF, I have hereunto
0 set my hand this 30th day of August,
1 2021.

Barbara Zeltman

3 BARBARA R. ZELTMAN
Professional Realtime Reporter
4 and Notary Public
COMM NO. HH 133639
5 EXP: August 9, 2025